

OFFICE OF THE ATTORNEY GENERAL  
EDWARD MANIBUSAN  
Attorney General  
Carl F. Dela Cruz (F0525)  
Assistant Attorney General  
Hon. Juan A. Sablan Memorial Bldg., 2nd Fl.  
Caller Box 10007, Capital Hill  
Saipan, MP 96950  
Telephone: 670-237-7500  
Email: carl\_delacruz@cnmioag.org  
Attorneys for Defendants  
*Edward C. Deleon Guerrero, Rafael S. Demapan, Mariano Taitano, Martin Mendiola, and  
Ramon M. Dela Cruz, in their official and personal capacities*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

IMPERIAL PACIFIC INTERNATIONAL CIVIL CASE NO. 24-00002  
(CNMI) LLC,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS, et. al.,

Defendants.

**DEFENDANTS EDWARD C. DELEON  
GUERRERO, RAFAEL S. DEMAPAN,  
MARIANO TAITANO, MARTIN  
MENDIOLA, AND RAMÓN M. DELA  
CRUZ's MOTION TO DISMISS  
PURSUANT TO FEDERAL RULE OF  
CIVIL PROCEDURE 12(b)(6)**

Defendants Edward C. Deleon Guerrero, Rafael S. Demapan, Mariano Taitano, Martin Mendiola, and Ramon M. Dela Cruz, in their official and personal capacities, respectfully move the court to dismiss this above-captioned action pursuant to Federal Rule of Civil Procedure 12(b)(6). Pursuant to Local Rule 7.1(b), this motion is accompanied by a legal memorandum in support of the motion.

Respectfully submitted,

OFFICE OF THE ATTORNEY GENERAL

EDWARD MANIBUSAN  
Attorney General

Date: April 26, 2024

/s/ Carl Dela Cruz

Carl F. Dela Cruz (F0525)  
Assistant Attorney General  
Attorney for Defendants  
Edward C. Deleon Guerrero;  
Rafael S. Demapan;  
Mariano Taitano;  
Martin Mendiola; and  
Ramon M. Dela Cruz